

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
FITZROY SIMEON LEWIS	:	CASE NO. 1:21-bk-00032-HWV
aka FITZROY S. LEWIS	:	
HEATHER ANN LEWIS	:	CHAPTER 13
aka HEATHER A. LEWIS	:	
Debtors	:	
	:	
TOWD POINT MORTGAGE TRUST	:	
2019-SJ1, U.S. BANK NATIONAL	:	
ASSOCIATION, AS INDENTURE	:	
TRUSTEE	:	
Movant	:	
	:	
v.	:	
	:	
FITZROY SIMEON LEWIS	:	
aka FITZROY S. LEWIS	:	
HEATHER ANN LEWIS	:	
aka HEATHER A. LEWIS	:	
Respondents	:	

DEBTORS' RESPONSE TO MOTION OF
TOWD POINT MORTGAGE TRUST 2019-SJ1, U.S. BANK
NATIONAL ASSOCIATION, AS INDENTURE TRUSTEE
FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, come Debtors, Fitzroy Simeon Lewis and Heather Ann Lewis, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted in part and denied in part. Debtors have no knowledge. Strict proof is demanded.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. The Mortgage speaks for itself. Strict proof is demanded. Debtors have no knowledge as to the current holder of the mortgage.
5. Admitted.

6. Admitted in part and denied in part. Debtors have no knowledge as to the holder of the mortgage. Strict proof is demanded.

7. Admitted in part and denied in part. Debtors have no knowledge. Strict proof is demanded.

8. Admitted in part and denied in part. Debtors admit to an arrearage. The amount of the arrearage is unknown. Strict proof is demanded.

9. Admitted in part and denied in part. See response to paragraph 8.

10. Denied. Debtors are providing adequate protection through regular monthly payments. To the extent that the monthly payments are in arrears, Debtors will make an offer in the near future to bring them current. Further, the property is necessary for an effective reorganization. The property is Debtors' residence.

11. Admitted in part and denied in part. Any attorneys fees requested should be resolved as part of the Motion for Relief.

WHEREFORE, Debtor/s respectfully request/s that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
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Attorney for Debtors

DATED: 9/21/22

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF TOWD POINT MORTGAGE TRUST 2019-SJ1, U.S. BANK NATIONAL ASSOCIATION, AS INDENTURE TRUSTEE FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

REBECCA A. SOLARZ, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

Carol V. Shay

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gary.imblum@imblumlaw.com
For Debtors

DATED: 6/27/2022